

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES WARD and KRISTIN WARD,)	
)	
Plaintiffs,)	
)	No. 12-cv-06236
v.)	
)	Judge Virginia M. Kendall
VERIZON WIRELESS SERVICES, LLC,)	
)	
Defendant.)	
)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant, Cellco Partnership d/b/a Verizon Wireless (incorrectly sued as Verizon Wireless Services, LLC) (“Verizon”), by its attorneys Hal R. Morris and Elizabeth A. Thompson (Arnstein & Lehr, LLP, *of counsel*), moves for an extension of time to answer or otherwise plead to Plaintiffs’ Amended Complaint. In support, Defendant states as follows:

1. This case is an action under the Telephone Consumer Protection Act brought by Plaintiffs Charles and Kristin Ward against Verizon.
2. Plaintiffs filed an Amended Complaint on November 28, 2012 and Verizon was to answer or otherwise plead by December 27, 2012.
3. The parties reached a settlement in principal on December 21, 2012 and are in the process of finalizing that agreement.
4. To preserve judicial and party resources, Verizon requests that its responsive pleading be continued for thirty days, up to and including January 28, 2013, in order for the parties to finalize and execute the settlement agreement.

5. Defendant's counsel spoke with Plaintiffs' counsel regarding this request and Plaintiffs' counsel has no objection to this request.

6. Because this matter has been settled in principle, subject only to the preparation of a written settlement agreement, no prejudice will result.

7. Should the parties finalize and execute the settlement agreement prior to January 28, 2013, the parties will file the appropriate stipulation to dismiss with prejudice.

WHEREFORE, Defendant respectfully requests that this Court enter an order granting it an extension of time to answer or otherwise plead up to and including January 28, 2013 and enter such other relief as is just and equitable.

Respectfully submitted,

Cellco Partnership

By: /s/ Elizabeth A. Thompson
One of its attorneys

Hal R. Morris
Elizabeth A. Thompson
Arnstein & Lehr, *of counsel*
120 South Riverside Plaza
Suite 1200
Chicago, IL 60606
(312) 876-7100
10609321.1

CERTIFICATE OF SERVICE

Elizabeth A. Thompson, an attorney, certifies that on December 28, 2012, she electronically filed **Defendant's Motion for an Extension of Time to Answer or Otherwise Plead** with the Clerk of Court by using the CM/ECF system, which sent notification of such filing to all parties of record.

/s/ Elizabeth A. Thompson